

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**ASUS TECHNOLOGY LICENSING INC.  
AND CELERITY IP, LLC,**

Plaintiffs,

v.

**SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
AND SAMSUNG RESEARCH AMERICA,**

Defendants.

**SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
AND SAMSUNG RESEARCH AMERICA,**

Counterclaim-Plaintiffs,

v.

**ASUS TECHNOLOGY LICENSING INC.,  
CELERITY IP, LLC, AND ASUSTEK  
COMPUTER, INC.**

Counterclaim-Defendants.

Civil Action No. 2:23-cv-409

**JURY TRIAL DEMANDED**

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**DECLARATION OF REBECCA CARSON IN SUPPORT OF PLAINTIFFS' MOTION  
TO DISMISS AND/OR SEVER COUNTERCLAIMS AGAINST ASUSTEK**

**DECLARATION OF REBECCA CARSON**

I, Rebecca Carson, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel for Plaintiffs ASUS Technology Licensing Inc., and Celerity IP, LLC. I am a member in good standing of the State Bar of California and have been duly licensed to practice law before all of the courts of the State of California, and have been admitted to practice *pro hac vice* before this Court. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, could testify to its contents.
2. Attached as **Exhibit A** is a true and correct copy of the Patent Assignment Agreement assigning U.S. Patent No. 10,187,878 from ASUSTeK Computer Inc., to ASUS Technology Licensing Inc., Reel/Frame 064796/0331.
3. Attached as **Exhibit B** is a true and correct copy of the Patent Assignment Agreement assigning, among others, U.S. Patent No. 11,291,052 from ASUSTeK Computer Inc., to ASUS Technology Licensing Inc., Reel/Frame 066711/0278.
4. Attached as **Exhibit C** is a true and correct copy of the Patent Assignment Agreement assigning U.S. Patent No. 10,104,658 from ASUSTeK Computer Inc., to ASUS Technology Licensing Inc., Reel/Frame 065957/0032.
5. Attached as **Exhibit D** is a true and correct copy of the Patent Assignment Agreement assigning, among others, U.S. Patent No. 10,785,759 from ASUSTeK Computer Inc., to ASUS Technology Licensing Inc., Reel/Frame 064788/0882.
6. Attached as **Exhibit E** is a true and correct copy of the Patent Assignment Agreement assigning, among others, U.S. Patent No. 10,986,585 from ASUSTeK Computer Inc., to ASUS Technology Licensing Inc., Reel/Frame 065965/0875.

7. Attached as **Exhibit F** is a true and correct copy of Samsung's Infringement Contentions, served March 11, 2024.

Executed on April 2, 2024. I declare under penalty of perjury that the foregoing is to the best of my knowledge and belief.

By: /s/ Rebecca Carson  
Rebecca Carson

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via email on [date].

/s/ DRAFT  
DRAFT